



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

Eric Teszler
Assistant Corporation Counsel
Office: (212) 356-1652

November 22, 2023

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: C.N. et al. v. N.Y.C. Dep't of Educ., 2

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the Office of O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs, and expenses for legal work performed on administrative proceedings, as well as for this action, pursuant to the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*

I write jointly with Plaintiffs' counsel to respectfully request an adjournment of the Initial Conference, currently scheduled for November 30, 2023 (*see* ECF No. 11), to January 18, 2024. Alternatively, the parties propose that the Initial Conference be adjourned to January 25, 2024, or another date that is convenient to the Court. This is the parties' second joint request for an adjournment of the Initial Conference; the first was granted by the Court on October 27, 2023 (*see id.*). The requested extension is intended to provide Defendant time to complete its internal review process of Plaintiff's attorney billing records, engage with Plaintiff in settlement discussions, and for the parties to hopefully resolve this fees-only matter. Defendant is able to resolve the majority of such fees actions with Mayerson & Associates without the need to burden the Court with any conferences or motion practice. The parties are optimistic that this matter to follow the same course.

Accordingly, the parties respectfully request that the Initial Conference currently scheduled for November 30, 2023 be adjourned to January 18, 2024, or another date thereafter that is convenient to the Court.

Thank you for considering this request.

Respectfully submitted,

/s/ Eric Teszler

Eric Teszler, Esq.
Assistant Corporation Counsel

cc: Gary S. Mayerson, Esq. (via ECF)